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VIA ECF

June 2, 2017

Chief Magistrate Judge Jennifer C. Boal
U.S. District Court, District of Massachusetts
1 Courthouse Way, Suite 2300
Boston, MA 02210

Re: NECC MDL No. 2419 – *Non-Bellwether Box Hill Cases*

Dear Judge Boal:

In accordance with the Court's comments regarding the Box Hill cases during the April 20, 2017 Case Management Conference, counsel for the claimants and the defendants in the Box Hill cases have been focusing their efforts on case-specific discovery required under Your Honor's Third Amended Order Setting Discovery Deadlines [Dkt. 3301] ("Discovery Deadlines Order") on the two cases selected as potential bellwether cases by both Plaintiffs and Defendants, namely the *Dreish* personal injury case and the *Kashi* survival/wrongful death case. So as to not leave open and hanging the parties' discovery obligations regarding the six other Box Hill cases before the Court, counsel have conferred and agreed that the Court should be requested to enter an order staying the Discovery Deadlines Order as to the non-bellwether Box Hill cases. A proposed consent order is submitted herewith for the Court's consideration. Its terms and form have been agreed to by counsel for both sides in the Box Hill cases.

On behalf of all parties in the Box Hill's cases, we ask the Court to consider and enter the proposed stay order.

Respectfully yours,

MICHAEL COREN

Attorney for Plaintiff Meghan Handy.

MC/lmh

Certificate of Service

I, Michael Coren, hereby certify that a copy of the foregoing document and consent proposed order, filed through the CM/ECF system will be accessible to those attorneys who are registered with the Court's electronic filing system and Notice of Electronic filing (NEF), including the attorneys representing the defendants in the above-referenced individual cases, and will be sent to these parties by operation of the CM/ECF system.

Dated: June 2, 2017

/s/ Michael Coren

Michael Coren